



August 7, 2013

Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *In the Matter of Accessibility of User Interfaces, and Video Programming Guides and Menus, MB Docket No. 12-108, Notice of Proposed Rulemaking (FCC 13-77)*

Dear Commissioners:

Pittsburgh Community Television Corporation submits this letter in the above-referenced rulemaking proceeding (NPRM) in support of the comments filed by the Alliance for Community Media; the Alliance for Communications Democracy; Montgomery County, Maryland; and the National Association of Counties, National Association of Telecommunications Officers and Advisors & U.S. Conference of Mayors.

Pittsburgh Community Television is a 501 (c) 3 non-profit contracted by the City of Pittsburgh to provide public access television services to local residents and non-profits. Our mission is to encourage dialogue, promote media literacy, provide a platform for free speech and build a stronger community through training and by providing local citizens and non-profit organizations with the tools to produce and broadcast programs from their own unique perspectives. Our programming is cablecast to over 90,000 cable subscribers on Comcast 21 and Verizon 47 in the City of Pittsburgh. Each year we cablecast over 8,000 hours of locally produced programming encompassing nine categories including arts/film/culture, community, general interest, health/lifestyle, music/entertainment, news/issues/public affairs, religious/spiritual, sports/recreation, and youth.

We carry the programs Democracy Now and Free Speech TV, both of which include closed captioning on our channels. The onscreen video programming guide of our multichannel video programming distributors (MVPD), Comcast and Verizon do not provide a label or symbol indicating that these programs have closed captions.

We have program descriptions and accessibility information readily available for our programs with accessibility options such as closed captions. We have approached both Comcast

and Verizon about carrying program descriptions on the guide. Comcast agreed to carry these descriptions and has done so but Verizon refused. The only explanation we have been given is that it is not technically feasible. On the Verizon system the program guide lists our channel as "local programming" with no other information. This level of information is inadequate to meet the accessibility goals of the Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA). Viewers cannot determine from the MVPD's video programming guide what our programs are and whether our programs are accessible. Thus, viewers with visual or auditory disabilities cannot make meaningful video program choices.

We urge the Commission to adopt rules that would require video programming guides and menus which display channel and program information include, for all channels, high level channel and program descriptions and titles, as well as a symbol identifying the programs with accessibility options (captioning and video description).

Thank you for the opportunity to submit these comments.

Sincerely,



John H. Patterson
Executive Director

51059.00048\8045103.2